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PACIFIC  TELESISSM
Group-Washington

September 27, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Dear Mr. Caton:

Re: CC Docket No. 95-116, Telephone Number Portability

On behalf of Pacific Telesis Group, please find enclosed an original and six copies of its "Comments on Petitions for Clarification and Reconsideration" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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SEP 27 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Telephone Number Portability

CC Docket No. 95-116

COMMENTS OF PACIFIC TELESIS GROUP
ON PETITIONS FOR CLARIFICATION AND RECONSIDERATION

Pacific Telesis Group ("Pacific") files these comments on Petitions for Reconsideration and Clarification filed in the above captioned proceeding. Specifically, Pacific opposes the Petitions seeking advancement on scheduling the bona fide request process for MSAs not covered in Appendix F of the Commission's *Number Portability Order*¹ (requiring implementation in the top 100 MSAs in the country). Further, Pacific supports the concerns raised by Petitioners that the FCC's *Number Portability Order* did not adequately address implementation issues, such as the extensive testing required in a network upgrade of this sort, OSS² revisions and availability, and the relationship of the Chicago testing to network implementation nationwide. In addition, we support the concerns of parties that interim number portability costs should be determined through negotiation and in state proceedings, and that the FCC's authority over it is limited.

¹ *Telephone Number Portability*, CC Docket No. 95-116, *First Report and Order and Further Notice of Proposed Rulemaking*, released July 2, 1996.

² Operational Support Systems.

I. THE COMMISSION SHOULD NOT IMPOSE ADDITIONAL REQUIREMENTS ON LECs TO IMPLEMENT LNP IN ADDITIONAL MSAs

The FCC has imposed a very aggressive timetable for implementation of local number portability. In California, we need to implement LNP in 13 MSAs by the end of December 1998. Those 13 MSAs in California constitute 85% of our wire centers, 93% of our NXXs and 89% of our lines. Obviously, implementing in accordance with the FCC directive will be extremely difficult and very resource-intensive. Therefore, the suggestion put forth by a few CLECs that the bona fide request process (in which CLECs can request LNP implementation in other MSAs after January 1, 1999) should be accelerated is extremely disturbing.

American Communications Service, Inc., KMC Telecom, Inc. and Nextlink Communications L.L.C. all seek reconsideration of the implementation schedule and request that the bona fide request process be accelerated so that LECs would need to implement LNP in areas outside the top 100 MSAs upon some showing (such as the existence of competition³). These companies fail to realize that implementing local number portability nationwide, in the top MSAs in the country is a daunting task, the likes of which have never before been attempted. The FCC has ordered us to roll out a brand new call processing method and within 15 months install it in the top 100 MSAs in the country from the start. All of our resources are needed for this work effort. We cannot, contemporaneous with this effort, be responding to bona fide requests, and adding additional offices for deployment.

³ Nextlink, p.5.

If anything, the Commission should be relaxing the implementation schedule⁴, not adding to it. The Commission should deny the Petitions of those companies seeking to increase the burden of implementation.

II. APPROPRIATE CONCERNS HAVE BEEN RAISED CONCERNING RELIABILITY OF THE NETWORK, TESTING AND IMPLEMENTING LRN IN THE TIME PERIOD GIVEN

USWEST, GTE and others have raised concerns about the effect of the *Number Portability Order* on network reliability. USWEST states that “the current deployment schedule adds an unnecessary degree of risk to the continued reliability of the public switched telecommunications network.”⁵ USWEST’s concerns stem from the massive changes in the public switched network necessitated by the *Number Portability Order*. In addition, the Chicago field test results may not be of real help, since the filing of the test results (September 30, 1997) is literally 1 day before implementation begins in the largest MSAs in the country. As Nynex points out, the Chicago field test will also not adequately test many of the systems that need to be in place since Ameritech will be performing many of these activities on a manual basis.

We share the concerns of these parties about network reliability. We need to ensure that any new software loaded into our network is adequately tested. Testing includes both network and node testing, as well as system testing. For the nodes, we need to carry out node testing, network testing, network and system testing, interoperability with others’ networks testing, and interconnection testing. For systems, we need to test the individual system, integrated systems, then network and

⁴ See Petition of GTE and USTA, requesting that certain offices within the top MSAs be excused from compliance using a waiver process. See also BellSouth Petition p. 11.

⁵ USWEST, p.2.

system testing, interoperability and interconnection testing. The interoperability and interconnection testing requires us to individually schedule and test with each carrier who wants to connect to our network. In the past, we have set up a testing schedule, based on first-come, first-served for carriers. Of course, utilizing QOR mitigates many of these concerns since it allows a ramp up of deployment in proportion to the number of customers whose numbers are ported to competitors.

We also share the concern of other carriers that the FCC's decision seems only to take into account switch software delivery, and not the hundreds of other systems and network nodes modifications that need to be accomplished before LNP can be implemented. As Pacific pointed out in various ex partes, the OSS work that needs to be done is daunting and extensive (see for example, Pacific's June 6, 1996 ex parte letter pointing out the impacts on ordering, provisioning, service assurance and billing systems.)

We agree with USTA that it makes sense to implement number portability only in those areas where interconnection has been requested.⁶ We support USTA's suggestion that a waiver process could be used to excuse compliance in a particular area because of an absence of a specific request from another telecommunications carrier.

III. THE FCC SHOULD ALLOW THE STATES TO CONTINUE TO BE ABLE TO OVERSEE INTERIM NUMBER PORTABILITY COST RECOVERY

We support the arguments of various parties that the Commission should not assert authority over cost recovery for interim number portability, and instead should allow parties to negotiate this amount or leave it to state commissions. In California, the CPUC ordered us to charge

⁶ USTA, p.16.

CLECs an incremental charge for interim number portability.⁷ The FCC does not need to take jurisdiction over this item pursuant to the Telecommunications Act, and it should decline to do so for the reasons stated in the Petitions of SBC, Bell Atlantic, and BellSouth. Because of the interim nature of these costs, they are particularly well suited for negotiation. They are not well suited for establishment of some administrative oversight agency to collect and disburse funds.

IV. QOR SHOULD BE ALLOWED

Many parties raised the issue of the technology choice to perform local number portability. All of these parties argue that QOR will result in substantial cost savings, more efficiently route calls within the network, and have less network reliability concerns. For all of these reason, and the reasons stated in our Petition for Clarification, or in the Alternative, Reconsideration, we support the use of QOR for calls originating in our network and destined for NXXs assigned to our network, or between consenting carriers.

V. 500/900 PORTABILITY SHOULD BE COMPETITIVELY NEUTRAL

We support USTA and BellSouth who argue that 500/900 portability should be implemented in a competitively neutral manner such that incumbent LECs are not disproportionately burdened. It would be contrary to the spirit of the Telecommunications Act of 1996 to burden one competitor while freeing another from regulatory obligations.

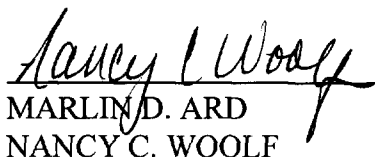
⁷ We have recently filed a petition for modification of that decision so that it will be in compliance with the *Number Portability Order*.

VI. CONCLUSION

The FCC should not make the implementation schedule more difficult or more burdensome for LECs. The *Number Portability Order* requires an enormous amount of resources to be devoted to number portability and increasing that workload is not advisable. As it is, serious implementation issues exist, with respect to testing and reliability. The FCC should allow QOR to be implemented in the way we have outlined, as it addresses some of these issues and has other benefits as discussed in the Petitions.

Respectfully submitted,

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Date: September 27, 1996

CERTIFICATE OF SERVICE

I, B. J. Peters, certify that the following is true and correct:

I am a citizen of the United States, State of California, am over eighteen years of age, and am not a party to the within cause.

My business address is 140 New Montgomery Street, Room 2521, San Francisco, California 94105.

On September 27, 1996, I served the attached "Comments of Pacific Telesis Group on Petitions For Clarification and Reconsideration" by placing true copies thereof in envelopes addressed to the parties in the attached list, which envelopes, with postage thereon fully prepaid, I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

Executed September 27, 1996, at San Francisco, California.

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By: _____
B. J. Peters

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